

WHEREAS, the May 18, 2011, Case Management Order of the Court set June 30, 2011, as both the fact discovery cutoff and the deadline for designation of opening experts with reports;

WHEREAS, the parties agree that good cause exists to extend the fact discovery cutoff and the deadline for designation of experts, as described in the Declaration of Karen K. Wind filed herewith;

WHEREAS, with the Court's approval, the parties propose to extend the fact discovery cutoff and the deadlines for designation of opening and rebuttal expert witnesses, as follows:

Fact Discovery Cutoff.....August 31, 2011

Designation of Opening Experts with Reports.....August 31, 2011

Designation of Rebuttal Experts with Reports.....September 30, 2011

WHEREAS, the parties agree that all other dates in the case schedule set by the Court in its Case Management Order shall remain the same, including the October 28, 2011, cutoff for expert discovery.

IT IS SO AGREED AND STIPULATED.

Respectfully submitted,

LAW OFFICES OF LAURENCE F. PADWAY

DATED: June 16, 2011

By: /s/ Karen K. Wind
KAREN K. WIND
Attorney for Plaintiff

DATED: June 17, 2011

By: /s/ William D. Hittler
WILLIAM D. HITTLER
Attorney for Defendant

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: June 17 __, 2011

Paul S. Grewal
The Honorable Paul S. Grewal
United States Magistrate Judge